

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

IN RE:	)	
	)	
GEMBER BERUK,	)	CASE NO. 22-10913-BFK
	)	
Debtor.	)	
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	)	
GEMBER BERUK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	AD. PRO. NO. 22-01050-BFK
	)	
U.S. DEPARTMENT OF EDUCATION, ET AL.,	)	
	)	
Defendants.	)	

CONSENT MOTION FOR ENTRY OF ORDER DISCHARGING STUDENT LOANS  
AND MEMORANDUM IN SUPPORT THEROF

The United States of America requests that the Court enter an order discharging the Plaintiff's student loans at issue in this proceeding pursuant to the provisions of 11 U.S.C. Section 523(a)(8). Counsel for the United States has discussed the relief requested in this motion with counsel for the Plaintiff who consents to such relief. As grounds for this Motion, the United States avers the following:

The above-captioned adversary proceeding was filed on October 18, 2022. Dkt. No. 1. In this adversary proceeding, Plaintiff seeks to discharge certain student loan obligations owed to the U.S. Department of Education (DoE Loan). Plaintiff asserts that requiring her to repay the

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loans would constitute an undue hardship pursuant to 11 U.S.C. Sec. 523(a)(8).<sup>1</sup>

The United States agrees that the Plaintiff is entitled to a discharge of the DOE Loan obligations at issue in this proceeding. The parties have executed a proposed Consent Order that accompanies this Motion.

#### CONCLUSION

For the foregoing reasons, the United States respectfully requests that its Motion be granted.

Respectfully submitted,

JESSICA D. ABER  
UNITED STATES ATTORNEY

By: /s/ Robert K. Coulter  
Robert K. Coulter  
Assistant United States Attorney

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<sup>1</sup> The Plaintiff and the U.S. Department of Education are the real parties in interest in this proceeding. Although named as a party to this proceeding, Great Lakes Education Loan Services, Inc., is a loan servicer, not a loan holder.

CERTIFICATE OF SERVICE

I hereby certify a copy of foregoing will be filed with the United States Bankruptcy Court electronically in the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Date: January 25, 2023

/s/ Robert K. Coulter  
ROBERT K. COULTER